

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

In re DOWNSTREAM ADDICKS AND
BARKER (TEXAS) FLOOD-CONTROL
RESERVOIRS

Sub-Master Docket No. 1:17-9002 L

20-591 L

THIS DOCUMENT RELATES TO:

YOUNG et al. v. UNITED STATES OF
AMERICA, CASE NO: 1:17-CV-01545

PLAINTIFFS' SHORT FORM COMPLAINT

By submitting this document, Plaintiffs adopts and incorporates by reference the Consolidated And Amended Downstream Master Complaint (ECF No. 23) filed in the above styled Sub-Master Docket on January 16, 2018, and all subsequent amendments to that Complaint. The Plaintiffs' Short Form Complaint is deemed Plaintiffs' Original Complaint if it is plaintiffs' original pleading, and must be filed as a new complaint through the Court's CM/ECF system.

If Plaintiffs have previously filed an Original Complaint, the filing of a Plaintiffs' Short Form Complaint amends and supersedes any prior complaint filed by the below-listed Plaintiffs *In re Addicks and Barker (Texas) Flood-Control Reservoirs*, Master Docket No. 17-3000L and/or *In re Downstream Addicks and Barker (Texas) Flood-Control Reservoirs*, Sub-Master Docket No. 17-9002L.

1. Name of Plaintiff(s):

- 1.1 Matt and Traci Sharrock
- 1.2 Tommy T. Maoz
- 1.3 Hyunil Jo and Shina Lee
- 1.4 Jerome C. and Catherine C. Yen
- 1.5 Katherine L. Haute

- 1.6 Caleb S. and Juan Atwood
- 1.7 Jennifer and Frank Papapanagiotou
- 1.8 Weili Zhu
- 1.9 Charles J. Lucas Jr.
- 1.10 Ina N. O'Connor (James O. O'Connor- Deceased)
- 1.11 Michael W. and Julie D. Sparks
- 1.12 John D. and Lauren A. Platt
- 1.13 Rajeev R. and Karen N. Pillai
- 1.14 Su C. Lee
- 1.15 Sophia Riemann
- 1.16 Nan and Xuechen Zhang
- 1.17 John D. and Cherie D. Platt
- 1.18 Ashish and Shibani Gupta
- 1.19 Joanna and Konrad Krakowiak
- 1.20 David and Tami Young
- 1.21 Prashanthi M. Prasad
- 1.22 William R. and Deborah D. Regone
- 1.23 Jamie and Rad Manning
- 1.24 Amer A. Rahim
- 1.25 Yong H. Marx
- 1.26 Sook N. Byun
- 1.27 Suck D. Cho
- 1.28 Chil S. Ko
- 1.29 John and Marylyn L. DeFilippo
- 1.30 Jorge E. Galindo
- 1.31 Gerrit O. Kirkwood
- 1.32 William H. and Debora H. York
- 1.33 Gerald and Marian Siegmyer
- 1.34 John Hughes Tenison
- 1.35 Stephen E. and Erin R. Danielson
- 1.36 Energy Building Systems, Inc
- 1.37 Kaslik Investments, L.C.
- 1.38 Monzer Hourani
- 1.39 Kaslik Investments, L.C.
- 1.40 Mary C. Horany
- 1.41 Energy Progression Systems, Inc.
- 1.42 Sachin Sheldekar

2. Location by address of Plaintiff(s) property subject to Plaintiff(s) allegations of a Fifth

Amendment taking without just compensation as a result of Addicks/Barker reservoir releases:

- 1.1 14354 River Forest Drive, Houston, Harris County, Texas 77079
- 1.2 102 Lakeside Oaks Drive, Houston, Harris County, Texas 77042
- 1.3 402 Isolde Drive, Houston, Harris County, Texas 77024
- 1.4 411 Kickerillo Drive, Houston, Harris County, Texas 77079

- 1.5 111 Warrenton Drive, Houston, Harris County, Texas 77024
- 1.6 210 Lakemere Street, Houston, Harris County, Texas 77079
- 1.7 515 Nottingham Oaks Trail, Houston, Harris County, Texas 77079
- 1.8 201 Vanderpool Lane, Unit 14, Houston, Harris County, Texas 77024
- 1.9 15179 Kimberley Court, Unit 54, Houston, Harris County, Texas 77079
- 1.10 15707 Walkwood Drive, Houston, Harris County, Texas 77079
- 1.11 906 Crossroads Drive, Houston, Harris County, Texas 77079
- 1.12 926 Coachlight Drive, Houston, Harris County, Texas 77077
- 1.13 827 Daria Drive, Houston, Harris County, Texas 77079
- 1.14 240 Litchfield Lane, Houston, Harris County, Texas 77024
- 1.15 12639 Huntingwick Drive, Houston, Harris County, Texas 77024
- 1.16 201 Vanderpool Lane, Unit 12, Houston, Harris County, Texas 77024
- 1.17 13818 Starhill Court, Houston, Harris County, Texas 77077
- 1.18 907 Bayou Parkway, Houston, Harris County, Texas, 77077
- 1.19 12633 Huntingwick Drive, Unit 171, Houston, Harris County, Texas 77024
- 1.20 15130 Turkey Creek Drive, Houston, Harris County, Texas 77079
- 1.21 1107 Briar Bayou Drive, Houston, Harris County, Texas 77077
- 1.22 15134 Turkey Creek Drive, Houston, Harris County, Texas 77079
- 1.23 1114 Fleetwood Place Drive, Houston, Harris County, Texas 77079
- 1.24 12362 Honeywood Trail, Houston, Harris County, Texas 77077
- 1.25 11711 Memorial Drive, Unit 73, Houston, Harris County, Texas 77024
- 1.26 12633 Memorial Drive, Unit 48, Houston, Harris County, Texas 77024
- 1.27 12633 Memorial Drive, Unit 191, Houston, Harris County, Texas 77024
- 1.28 110 Lakeside Valley Drive, Houston, Harris County, Texas 77042
- 1.29 14711 Quail Grove Lane, Houston, Harris County, Texas 77079
- 1.30 602 Woodbend Lane, Houston, Harris County, Texas 77079
- 1.31 1246 Almond Grove Drive, Houston, Harris County, Texas 77077
- 1.32 10107 Shady River Drive, Houston, Harris County, Texas 77042
- 1.33 201 Vanderpool Lane, Unit 128, Houston, Harris County, Texas 77024
- 1.34 11102 Riverview Drive, Houston, Harris County, Texas 77042
- 1.35 12914 Kingsbridge Lane, Houston, Harris County, Texas 77077
- 1.36 1 Carlton Park Court, Houston, Harris County, Texas 77024
- 1.37 2 Carlton Park Court, Houston, Harris County, Texas 77024
- 1.38 3 Carlton Park Court, Houston, Harris County, Texas 77024
- 1.39 4 Carlton Park Court, Houston, Harris County, Texas 77024
- 1.40 5 Carlton Park Court, Houston, Harris County, Texas 77024
- 1.41 7 Carlton Park Court, Houston, Harris County, Texas 77024
- 1.42 13826 Trailville Drive, Houston, Harris County, Texas 77077

a. Tax number for identified property:

- 1.1 0973420000026
- 1.2 1080250000003
- 1.3 0900260000025
- 1.4 0983530000004
- 1.5 0925410000005

1.6 0942060000093
1.7 1000790000015
1.8 1043940000014
1.9 1090730000054
1.10 1075140000005
1.11 1075190000009
1.12 1079070000031
1.13 1075170000007
1.14 1062130000126
1.15 0993690000174
1.16 1043940000012
1.17 1079150000037
1.18 1161720120021
1.19 0993690000171
1.20 0992650000010
1.21 0954320000018
1.22 0992650000009
1.23 1143010010018
1.24 1012750000015
1.25 1133610000005
1.26 1118290040012
1.27 1118290180001
1.28 1080250000007
1.29 1000030000011
1.30 1157920010017
1.31 1139700000015
1.32 0932180000781
1.33 1043940000128
1.34 1023870000016
1.35 1158000000007
1.36 1158870010001
1.37 1158870010002
1.38 1158870010003
1.39 1158870010004
1.40 1158870010005
1.41 1158870010007
1.42 1079160000004

b. Real property interest possessed by Plaintiff(s) alleged to have been taken

Ownership (*i.e.*, fee simple) X Leasehold X Other _____

c. Manner of alleged taking of the property interest(s) listed in paragraph 2(b) above

Temporary _____ Permanent _____ Both X

3. Type of property alleged to have been taken:

Real Property _____ Personal Property _____ Both X

RESPECTFULLY SUBMITTED,

McGEHEE ★ CHANG, LANDGRAF, FEILER

By: /s/ H. C. Chang
Jack E. McGehee
jmcgehee@lawtx.com
H. C. Chang
hcchang@lawtx.com
10370 Richmond Ave., Suite 1300
Houston, Texas 77042
(713) 864-4000
(713) 868-9393 fax

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF system, which will send notifications of such filing to the CM/ECF participants registered to receive service in this matter.

Dated: May 12, 2020

By: /s/ H.C. Chang
H. C. Chang